REMARKS

Claims 5, 20-21, and 29-36 have been amended. No claims have been canceled. No new claims have been added. Claims 2-8, 11-13, 15, 18-22, and 29-36 are pending.

Claims 29 – 32 stand objected due to a minor informality. Claims 29-32 have been amended as suggested in the Final Rejection. Accordingly, the objection to claims 29 – 32 should be withdrawn.

Claims 5 and 30 stand objected due to minor informalities. Claims 5 and 30 have been amended to address the minor informality. Additionally, typographical errors have been corrected on claims 20-21 and 33-36. Accordingly, the objections to claims 5 and 30 should be withdrawn.

Claims 2-8, 11-13, 15, 18-22, and 29-36 stand rejected under 35 U.S.C. 102(e) as being anticipated by Walters (U.S. Patent No. 6,914,695). NB: The text of the Final Rejection states that the rejection applied to claims 2-8, 11-15, 18-22, and 29-35 (emphasis supplied), however, since claim 14 was canceled, and also based on paragraph 6, it is assumed the Final Rejection intended to exclude claim 14 and include claim 36. This rejection is respectfully traversed.

Claim 33 and 36 recite, *inter alia,* "attempting to identify said peripheral device and if successfully identified, mapping from the successfully identified peripheral device to a corresponding one of said resident programs, or if not successfully identified, mapping from a communication protocol specified by said peripheral device to a corresponding one of said resident programs."

Claim 34 recites, *inter alia,* "attempting to identify said peripheral device and if successfully identified, mapping from the successfully identified peripheral device to a corresponding one of said communication protocol means, or if not successfully identified, mapping from a communication protocol specified by said peripheral device to a corresponding communication protocol means."

Claims 35 and 29 recite, *inter alia,* "attempting to identify said peripheral device; if successfully identified, mapping from said identified peripheral device to a corresponding one of

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said resident programs, or if not successfully identified, mapping from a communication protocol specified by said peripheral device to a corresponding one of said resident programs."

Walters discloses a computer-based system for use with digital cameras. More specifically, the system includes a first computer, which serves as a wireless interface device for a variety of digital cameras. The first computer preferably has multiple interface means for communicating with digital cameras, including, for example, a wireless LAN (i.e., 802.11) interface, a Bluetooth wireless network interface, and an infrared interface. In one disclosed embodiment, the first computer is an IBM ThinkPad notebook computer. Column 6, lines 32-47.

According to the Office Action, the digital camera corresponds to the claimed peripheral device, while the IBM ThinkPad corresponds to the wireless device. The Office Action also states that:

(1)   Walter discloses a plurality of resident programs, each associated with a communication protocol, and cites to column 5, lines 18-21, which discloses "... Bluetooth technology, like other current wireless communication protocols, requires support from varying amounts of hardware that is specific to one of a variety of communication protocols."

It is respectfully asserted that the cited passage does not disclose or suggest what the Office Action states it stands for.

(2)   Walter discloses the IBM ThinkPad as a computer platform which comprises an operating system, specifically one of Microsoft's Windows-series of operating systems, and cites to column 2, lines 27-32, which recites a PC running one of Windows 95, Windows 98, and Windows 2000 as an operating system. The undersigns notes that the cited passage is in the "background" portion of Walters and is not directed to the IBM ThinkPad, but concedes that it is well known that a device such as an IBM ThinkPad can run the Microsoft Windows family of operating systems.

(3)   Walter discloses that the Windows operating system on the IBM ThinkPad is capable of identifying a resident program for use with the peripheral device, when the device cannot be successfully identified, by mapping from a communication protocol specified by the peripheral device to one of a set of resident programs, and cites to column 13, lines 10-

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52. The cited passage corresponds to a description of the data structure illustrated in Fig. 8 used to associate peripheral devices with users, but does not disclose any mechanism for mapping a resident program based upon a specified protocol, as recited in the independent claims.

Given the August 2001 filing date of Walters, the IBM ThinkPad would likely be running Windows Me (originally released September 14, 2000), Windows 2000 (originally released February 17, 2000), or perhaps some version of Windows 98 (originally released June 25, 1998). Significantly, Windows 98, Me, and 2000 (and also XP), use a driver architecture model known as the Windows Driver Model, or WDM.

Significantly, one key concept introduced by the WDM is that of a class driver, which does the bulk of the work for a specific area of functionality. For example, class drivers can exist for the USB, the IEEE 1394 bus, streaming devices, and human interface devices (HIDs). However, a separate driver for a specific device is still required, although the separate driver can (i.e., should) call and use the class driver to simplify the implementation of the separate driver. For example, in order to communicate with a specific USB device, Windows would require a specific driver for the USB device, which might communicate with the specific device by using USB Request Blocks. Thus, the specific driver calls the USB class driver, which provides a facility for exchanging USB Request Blocks. See http://phdcc.com/WDMarticle.html. Thus, for versions of Windows using the WDM driver architecture, such as that of the ThinkPad in Walters, a combination of device drivers including a class driver and a specific drivers are used for communicating with an identifiable hardware device. Since Windows cannot use only a class driver for communicating with a device, the ThinkPad in Walters cannot perform mapping based upon a communication protocol to one of the resident programs as recited in the above quoted portions of the independent claims.

CONCLUSION

In light of the amendments contained herein, Applicants submit that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

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